

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

OCT 25 2022

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY MA DEPUTY CLERK

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
CHARLES WRIGHT,)
)
Defendant.)

CRIMINAL NO.

5:22-MJ-1678-RBF

PROBABLE CAUSE AFFIDAVIT

I, SSgt Maurice Sanders, do hereby state and depose as follows:

On or about April 5, 2022, at about 16:50 p.m., while performing routine patrolman duties at Joint Base San Antonio-Randolph Texas, in the Western District of Texas and within the special maritime and territorial jurisdiction of the United States.

During the aforementioned time and location, myself, and SSgt Joshua Harris were dispatched to Building #1068 (AAFES Base Exchange) to investigate a report of theft of government property. Upon arrival, we spoke with Loss Prevention Officer Robert J. Holston. Mr. Holston informed me that he had video evidence showing Mr. Charles Wright (hereafter, "Defendant") shoplift multiple items. Mr. Holston tried to stop Defendant however, he fled the scene on foot. Defendant was eventually detained and searched. During the search, there was paraphernalia found in the form of a syringe, and a pipe on Defendant's person. After the search Defendant was brought back to building #235 for additional processing. SSgt Harris and I watched the surveillance footage with Mr. Holston and the video confirmed Defendant picked multiple items (liquor and perfume) and placed them into his basket, and continued to leave the AAFES Base Exchange past the point of entry/exit without rendering payment.

Based on my training, experience, review of the case file, video and statements of witnesses, I believe Defendant stole the above mentioned items from AAFES Base Exchange having a value of less than \$500.00 without having the intention of rendering payment and was in possession of paraphernalia while on JBSA Randolph, Texas.


The foregoing is true and correct to the best of my knowledge, information and belief.



Maurice Sanders
902d Security Forces
JBSA-Randolph Texas

Sworn to (affirmed) and subscribed before me this 20th day of October 2022, by Officer
Maurice Sanders.

KELLY E. PLETZ Sgt USAF
Paralegal
Notary Public by Federal Statute
Authorized by 10 U.S.C. 1044a


Signature of Notary Public
Notary Public, State of Texas



Probable cause found: _____

No probable cause found: _____


United States Magistrate Judge

Date 11/9/2022